

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JASON MEDRANO,
PLAINTIFF

V.

Case No. 5:19-cv-549-JKP

HON. JAVIER SALAZAR,
DEFENDANT

**PLAINTIFF'S UNOPPOSED
MOTION FOR CONTINUANCE
AND TO STAY THE PROCEEDINGS**

TO THE HONORABLE DISTRICT COURT JUDGE PULLIAM:

NOW COMES Plaintiff Jason Medrano and urges the Court to Continue the hearing set for December 8, 2020 and to Stay the Proceedings, and would show in support of this Motion the following:

1. This is a civil rights case challenging Plaintiff's inclusion into the TXGANG database. Three dispositive motions are pending, including Plaintiff's Motion for Summary Judgment, Defendant Salazar's Motion for Summary Judgment, and Defendant Paxton's Motion to Dismiss, under Federal Rule 12(b). These motions are set for a hearing on December 8, 2020.
2. Counsel for Plaintiff has been a sole practitioner and is the only attorney that has made an appearance in this case for Plaintiff. Counsel for Plaintiff ran for, and was elected to, Hays County Court at Law #3; the results of which were final on November

10, 2020. She has never sat on a bench before and must attend the 2020 College for New Judges, which is being put on virtually this year on December 7th and 8th of 2020. There are additional recorded classes, several hours long, that new judges are urged to watch before December 7th.

3. It is necessary to secure the rights of Medrano to continue the hearing set for December 8th and to STAY the proceedings of this case until Medrano can secure new counsel. The Stay is necessary because it may take new counsel some time to get caught up on the discovery, pleadings, and pending motions.
4. Counsel for Plaintiff consulted with opposing counsel for both Defendants and they are UNOPPOSED to this Motion and the relief sought.
5. Counsel for Plaintiff will follow this motion with a notice of withdrawal once she has an updated address for Medrano to provide the Court.

Wherefore, premises considered, Plaintiff prays that the hearing set for December 8, 2020 be continued and the case Stayed pending Medrano's retention of new counsel.

Respectfully Submitted,
PLAINTIFF

By:
/s/ Millie L. Thompson
Millie L. Thompson
Texas State Bar Number: 24067974
The Law Office of Millie L. Thompson
100 Commons Rd., Ste. 11

Dripping Springs, Texas 78620
Telephone: (512) 293-5800
Fax: (512) 682-8721
Email: millieaustinlaw@gmail.com

Certificate of Service

I, Millie Thompson, do hereby certify that on this the 1st day of December 2020, a true and correct copy of this Plaintiff's Motion for Continuance and to Stay the Proceedings was served on all parties of record via CM/ECF efilings.

/s/ Millie L. Thompson
Millie Thompson, Plaintiff's Attorney

Certificate of Conference

I, Millie Thompson, do hereby certify that I conferenced with opposing counsel Pamela Bell and Cristina Moreno on November 27-30, 2020 by email, and they are UNOPPOSED to the relief sought in this motion.

/s/ Millie L. Thompson
Millie Thompson, Plaintiff's Attorney